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Prepped by Charmelle Mathews

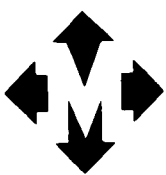
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A-90-16

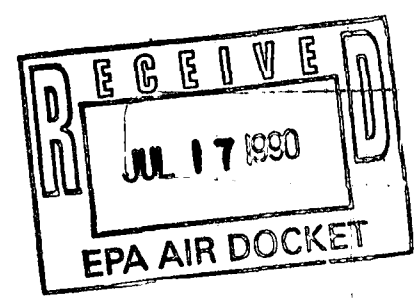
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MAPCO PETROLEUM INC.

W. Jeffrey Hart
PRESIDENT

July 12, 1990



U.S. Environmental Protection Agency
Public Docket A-90-16
Room M-1500
401 M Street, SW
Washington, DC 20460

Re: Ethyl MMT Waiver Request

MAPCO PETROLEUM Inc. (MPI) supports Ethyl Corporation's application for use of its fuel additive, methylcyclopentadienyl manganese tricarbonyl (MMT), commercially labelled as HiTEC 3000 by Ethyl.

MPI's support of this additive is based on results from Ethyl's two-year comprehensive testing program. Some of the benefits of MMT utilization are as follows:

- Improvements in Refinery Operations
 - Allow refiners to reduce the severity with which they process crude oil
 - Reduce level of aromatics in gasoline
 - Could further reduce automotive emissions of reactive volatile compounds and emissions of other noxious air pollutants which are possible cancer-causing agents
- MMT does not cause or contribute to the failure of emission control systems
 - Additive causes a significant reduction in overall vehicle emissions
 - Would allow refiner to exclude octane-producing components normally included in the gasoline blend which contributes to hydrocarbon emissions, fuel volatility, and emissions of other pollutants

MAPCO PETROLEUM Inc. requests that the Ethyl Corporation be granted a waiver under the Clean Air Act by the EPA and be allowed to sell MMT (commercially known as HiTEC 3000) as a gasoline additive.

Sincerely,

WJH:bb
cc: Mary T. Smith, Director
Field Operations and Support Div.
(EN-397F)